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Attorneys for Plaintiff
9 UNITED STATES OF AMERICA
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11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 EDWIN OSVALDO MANRIQUEZ,

17 Defendant.
18

No. 2:25-MJ-03653

STIPULATION RE: POST-INDICTMENT
ARRAIGNMENT

19
20 Plaintiff United States of America, by and through its counsel
21 of record, the United States Attorney for the Central District of
22 California and Assistant United States Attorney Joshua J. Lee, and
23 defendant EDWIN OSVALDO MANRIQUEZ ("defendant"), both individually
24 and by and through his counsel of record, Drew Havens, hereby
25 stipulate as follows:

26 1. On or about June 13, 2025, defendant was arrested for
27 violating 18 U.S.C. § 111 (Assault on a Federal Officer). The Speedy
28 Trial Act of 1974, 18 U.S.C. § 3161(b), originally required that an

1 information or indictment be filed on or before July 14, 2025.

2 Defendant has waived preliminary hearing.

3 2. By this stipulation, the parties jointly move to continue
4 the post-indictment/information arraignment to July 25, 2025 at 11:30
5 a.m.

6 3. The parties agree and stipulate, and request that the Court
7 find that the ends of justice outweigh the interest of the public and
8 defendant in the filing of an information or indictment within the
9 original date prescribed by the Speedy Trial Act because defense
10 counsel is seeking additional time to conduct pre-indictment
11 investigation and legal research, review initial discovery, confer
12 with his client regarding this matter, and to potentially resolve
13 this matter pre-indictment.

14 4. Based on the foregoing, the parties request that the Court
15 find that for the purpose of computing time under the Speedy Trial
16 Act, 18 U.S.C. § 3161(b), within which an information or indictment
17 must be filed, the time period of July 14, 2025 to July 25, 2025, is
18 deemed excludable pursuant to 18 U.S.C. § 3161(h) because the ends of
19 justice served by granting a continuance outweigh the best interest
20 of the public and defendant in a filing of an information or
21 indictment within the period specified in Section 3161(b).

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1 5. The parties agree and stipulate and request that the Court
2 find that nothing in this stipulation and order shall preclude a
3 finding that other provisions of the Speedy Trial Act dictate that
4 additional time periods are excludable from the period within which
5 an information or indictment must be filed.

6
7 Dated: June 26, 2025

Respectfully submitted,

8 BILAL A. ESSAYLI
United States Attorney

9 CHRISTINA SHAY
10 Assistant United States Attorney
11 Chief, Criminal Division

12 /s/

13 JOSHUA J. LEE
Assistant United States Attorney

14 Attorneys for Plaintiff
15 UNITED STATES OF AMERICA

16
17 Dated: June 26, 2026

 /s/ Drew Havens (with permission)

18 DREW HAVENS
Attorney for Defendant
EDWIN OSVALDO MANRIQUEZ

19
20 *Pursuant to Local Rule 5-4.3.4(2), the filer attests that all
21 signatories listed, and on whose behalf the filing is submitted,
22 concur in the filing's content and have authorized the filing.